

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

OCTOBER 85

5. Personnel Training During Post-Closure

The owner/operator of an interim status surface impoundment is completing closure. All standing hazardous waste liquids have been removed; however, some hazardous waste residues and contaminants will remain in place. Therefore, the owner/operator, per §265.228(c), will provide post-closure care as for a landfill. There will be no active management of hazardous waste or hazardous waste leachate during the post-closure period. In the post-closure permit application which the owner/operator must submit, is he required to meet the "personnel training" requirement listed in §264.16?

The owner/operator of an interim status surface impoundment must address all the information requirements in 15 and 17. If the post-closure permit application does not include the information covering training programs as required by §270.14(b)(12), the owner/operator must include a justification for not meeting this requirement.

The personnel training requirement of §264.16 is designed primarily to ensure the facility's compliance with the requirements of Part 264. If the owner/operator of the closed surface impoundment is no longer actively managing hazardous waste, then personnel training may not be required during the post-closure operating period. Post-closure permit guidance, being prepared by the Permits and State Programs Division of the Office of Solid Waste, will address technical and administrative requirements for the post-closure care period. The permit writer continues to have authority to ask for more information from the owner/operator as the situation may require.

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